# Exhibit 1-1

| TOPIC No./Nos. (*Pending before Special Master) | Topics / Google Comments | Google Comments / Proposals | Date(s) | Start Time | Witness | Remote / In-Person | If date/witness left blank, please confirm if Google is refusing to provide a witness |
|---|---|---|---|---|---|---|---|
| Topic 66 | Google's acquisition of DoubleClick and any exclusive access or rights afforded to AdX after and as a result of that acquisition. | | | | *Neal Mohan per Paul Yettter 4/18/24* | | |
| *Topics 1, 2, 3, 4, and 16 | Google's discovery efforts, preservation, collection, and links (16) | | | | | | |
| Topic 6 | The nomenclature or terms that Google uses to refer to the Google Ad Tech Products and Ad Tech Auction Mechanics relevant to this case | "Google will designate a witness or witnesses to testify regarding the internal and external nomenclature commonly used for the Google Ad Tech Products and Ad Tech Auction Mechanics relevant to this case." | | | | | |
| *Topics 17-19 | Source code (17) and Chats (18-19) | | | | | | |
| Topic 22 | The integration between Google Ad Tech Products and any third-party system, including the ease of such integration and the data sharing and flow of data between Your Ad Tech Products and such systems. | "Google proposes to designate a witness or witnesses to testify regarding: The nature or types of integrations that Google's ad server, ad exchange, and ad buying tools have with third-party products relevant to display advertising." | | | | | |
| Topics 29 – 30 | 29.Identification of all persons who performed work on the Ad Tech Products and/or Ad Tech Auction Mechanics. 30.Identification of the person(s) most knowledgeable regarding the Ad Tech Products and/or Ad Tech Auction Mechanics. | Google proposes to designate a witness or witnesses to testify regarding: "The Google employees primarily responsible for conceiving and implementing the Ad Tech Auction Mechanics at issue in the case." | | | | | |
| *Topic 36 | 36.Your decision to deprecate third-party cookies in Chrome and/or Android, implement FLEDGE ("First Locally-Executed Decision over Groups Experiment"), the Privacy Sandbox, and/or Protected Audience API, and the consequences and effects thereof, including any analysis of the impact of such deprecation and implementation, including but not limited to the impact on Publisher revenues and the DSP market. | | | | | | |
| Topics 40-42, 44, 51-52: | Representations made to publishers, advertisers and third-parties, on different relevant issues in case. | "Google proposes to designate a witness or witnesses to testify regarding: Google's communications programs or strategies relating to Reserve Price Optimization, Dynamic Revenue Share, and Bernanke." | | | | | |
| Topic 45 | 45.The number and identity of Publishers and Advertisers to which You disclosed each Ad Tech Auction Mechanic, in full or in part, and the specific disclosures made to each such Publisher and Advertiser. | "Google proposes to: identify its disclosures of Reserve Price Optimization, Dynamic Revenue Share, and Bernanke in writing on or before May 3, 2024." | | | | | |
| Topic 55 | 55.Complaints, concerns, or questions by any Publisher, Advertiser, or other third-party relating to the fairness, transparency of, or bias in Your Ad Auctions, and Your responses thereto, including relating to whether AdX ran a second-price auction prior to 2019. | | | | | | |
| Topic 65 | 65.Any of Your defenses, whether or not formally raised in this Action, including all factual bases therefore, and the identity of all documents bearing on, supporting, or refuting each such defense. | "Google proposes to: provide the factual basis for each of Google's affirmative defenses in writing on or before May 3, 2024." | | | | | |
| Topic 74 | 74.Your business plans, strategic plans, financial plans, marketing plans, forecasts, analyses, estimates, or reports related to the Ad Tech Products and/or Ad Tech Auction Mechanics. | "We are considering whether Google could reasonably prepare a witness on a clarified version of this topic and will get back to you shortly" | | | | | |
| Topics 75 and 76 | 75.Google's accounting policies and procedures related to the Ad Tech Auction Products and Ad Tech Auction Mechanics, including how Google calculates profits, revenue, fees, and margins including but not limited to DFP, AdX, Google Ads, and DV360. 76.Google's profits, revenue, fees (broken down by pricing tier), and margins for its Ad Tech Products | "With respect to Topics 75 and 76 (relating to accounting policies and procedures and financial information), as we noted on March 19, Google already provided extensive 30(b)(6) testimony on these topics in the Virginia case. If it will resolve the need for additional duplicative testimony, Google will agree that the 30(b)(6) testimony of ▋▋▋▋ from the Virginia case can be used as if it were taken in this case." | | | | | |
| Topic 83, Topic 104(f), 104(i), 104(q) | The effects of each Ad Tech Auction Mechanic on Google's fees, revenue share, margins, and take-rates | "Google proposes to conduct a reasonable investigation into whether Google analyzed, in the ordinary course of business, the effect of an Auction Mechanic on fees, revenue share, margins, and/or take-rates or "Header bidding's impact on winning prices paid by Advertisers and/or received by Publishers for impressions and take rates charged by ad exchanges," ordinary course "analysis of the flow of queries running through Header Bidding as compared to Open Bidding," and ordinary course analysis of the "impact of Header Bidding on Your Metrics, Publishers' and/or Advertisers' Metrics, and Your competitors' Metrics" and identify or produce any such ordinary course analyses before May 3, 2024." | | | | | |
| Topic 104(c) | c.any changes you made to Your Ad Tech Products in connection with or that had an effect on header bidding, including line item caps, any data redactions, or failure to share data (including, but not limited to min_bid_to_win data) | "Google will designate a witness to testify regarding Google's provision of minimum bid to win data." | | | | | |
| Topic 104 (e), (j), (k), (n) (q) | Changes, limitations, impacts, latency studies, analysis of flow of queries, contracts, decisions, and efforts related to header bidding, and groups or teams studying header bidding | | | | | | |
| Topics 105-106 | Source code, algorithms, and database configurations related to Ad Tech Productions, Ad Tech auctions, and Ad Requests | | | | | | |